

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA

IN RE: MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> , Debtors.	Chapter 11 Bankruptcy Case No. 23-00623 MOTION TO EXTEND TIME TO OBJECT TO CLAIMS
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COMES NOW Dan R. Childers, in his sole capacity as Trustee of the Mercy Hospital Liquidation Trust, and in support of this Motion respectfully states:

1. On or about June 7, 2024, this Court entered and enrolled an Order confirming the Debtors' Plan (Dkt #1114).
2. Part of the Plan created a Liquidation Trust.
3. The Liquidation Trust was to be administered by a Trustee.
4. A Trustee was initially appointed, but since then, and specifically circa August 9, 2024, Dan R. Childers was appointed as Successor Trustee, pursuant to action by the Oversight Committee, in accordance with the terms of this Court's Order confirming the Plan and the terms of the Liquidation Trust.
5. At pages 114 and 17 of the Plan, a date of October 22, 2024 was established as the deadline to object to general (non-administrative and non-professional) claims. *See also* Notice of June 24, 2024 Effective Date, Dkt #1139.
6. In light of the recent appointment of the Successor Trustee, the Successor Trustee and his retained professionals are attempting to familiarize themselves with the various aspects of this case, and of course notably the task to examine the many proofs of claim that have been filed.

7. The Successor Trustee needs additional time so he and his retained professionals may thoroughly review and examine the various proofs of claims to determine if the proofs of claims are valid, or whether objections should be lodged.

8. The Plan at ¶(J)(1) p.114 specifically provides additional time may be requested from this Court, so as to enable a party in interest (such as a liquidation trustee) sufficient time to review and examine proofs of claim.

9. The Successor Trustee suggests an additional 90 days beyond the original October 22, 2024 objection deadline (*i.e.* through and including January 20, 2025) should be allowed, and sufficient cause exists to grant the extension request.

WHEREFORE, the Liquidation Trustee respectfully prays this Court on such notice and hearing as it may direct, enter and enroll an Order granting the relief requested in this Motion, and for such other relief as may be just and proper under the premises.

/s/ Eric W. Lam

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Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 30th day of August, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ Kelly Carmichael